



ALABAMA DEPARTMENT OF AGRICULTURE AND INDUSTRIES  
PESTICIDE MANAGEMENT SECTION

1445 Federal Drive • Montgomery, Alabama 36107-1123

**John McMillan**  
*Commissioner*  
January 25, 2018

Tawanda Maignan, Chief  
U.S. EPA / Office of Pesticide Programs  
Emergency Response Team  
Document Processing Desk (EMEX)  
Room S4900, One Potomac Yard  
2777 Crystal Drive  
Arlington, VA 22202

Dear Ms. Maignan:

The Alabama Department of Agriculture and Industries hereby submits a recertification request a specific exemption granted in FY16 (16AL01) for the use of the Dow AgroSciences, LLC product Transform WG (EPA Reg. No. 62729-625), active ingredient sulfoxaflor, to control control sugarcane aphids in sorghum. The petition has been reviewed by the Alabama Pesticide Review Committee and they recommend approval of the request for recertification without changes to the original petition. Addition information has been requested as follows:

The total number of years ADAI has requested this use is 2 (two) years;

the number of acres treated (use report) each year is:

State	Crop	Use estimates from 2017 (acres)
AL	Sorghum	3,500 acres

; and the growing season in Alabama is April-October.

If any further information is required please contact me directly at 334-240-7237 or [tony.cofer@agi.alabama.gov](mailto:tony.cofer@agi.alabama.gov).

Sincerely,

Tony L. Cofer, Division Director  
Pesticide Management, Plant Industries and Professional Services  
Alabama Department of Agriculture & Industries

CC: Section 18 Dow Transform WG  
Tami Jones-Jefferson, Dow AgroSciences, LLC



Dow AgroSciences

Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

## Transform<sup>®</sup> WG

EPA Reg. No: 62719-625

For Control of Sugarcane Aphid (*Melanaphis sacchari*) in Sorghum

Section 18 Emergency Exemption

File symbol: XXXXXX

FOR DISTRIBUTION AND USE ONLY IN ALABAMA UNDER SECTION 18 EMERGENCY EXEMPTION  
This Section 18 Emergency Exemption is effective XXXXX and expires XXXXX.

- This labeling must be in the possession of the user at the time of application.
- It is in violation of federal law to use this product in a manner inconsistent with its labeling.
- Read the label affixed to the container for Transform<sup>®</sup> WG insecticide before applying. Carefully follow all precautionary statements and applicable use directions.
- Any adverse effects resulting from the use of Transform WG under this emergency exemption must be immediately reported to the Alabama Department of Agriculture and Industries.

**Environmental Hazards Statement:** This product is highly toxic to bees exposed through contact during spraying and while spray droplets are still wet. This product may be toxic to bees exposed to treated foliage for up to 3 hours following application. Toxicity is reduced when spray droplets are dry. Risks to managed and native pollinators from contact with pesticide spray or residues can be minimized when applications are made before 7:00 a.m. or after 7:00 p.m. local time or when the temperature is below 55 degrees Fahrenheit (°F) at the site of application.

### Directions for Use

#### Pests and Application Rates:

Pests	Transform WG (oz/acre)	Comments
Sugarcane aphid	0.75 – 1.5 (0.023 – 0.047 lb ai/acre)	Use a higher rate in the rate range for heavy pest populations.

**Application Timing:** Treat in accordance with local economic thresholds. Consult your Dow AgroSciences representative, cooperative extension service, certified crop advisor or state agricultural experiment station for any additional local use recommendations for your area.

**Application Method:** Control of sugarcane aphid may be contingent on thorough coverage to the crop. Use sufficient water to get full coverage of the canopy. It is recommended that a minimum of 5 gallons of water be applied by air.

**Spray Drift Management:** Applications are prohibited above wind speeds of 10 miles per hour (mph). Applications must be made with medium to coarse spray nozzles (i.e., with median droplet size of 341 µm or greater).

#### Restrictions:

- **Preharvest Interval:** Do not apply within 14 days of grain or straw harvest or within 7 days of grazing, or forage, fodder, or hay harvest.
- A restricted entry interval (REI) of 24 hours must be observed.
- Do not make more than two applications per acre per year.
- **Minimum Treatment Interval:** Do not make applications less than 14 days apart.
- Do not apply more than a total of 3.0 oz of Transform WG (0.09 lb ai of sulfoxaflor) per acre per year.
- Do not apply product ≤ 3 days pre-bloom or until after seed set.

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R396-180

Approved:

Replaces R396-168



Dow AgroSciences

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Dow AgroSciences LLC  
9330 Zionsville Road  
Indianapolis, IN 46163

dowagro.com

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December 6, 2017

Dr. Kathy Flanders  
Extension Specialist and Professor  
201 Extension Hall  
Auburn University, AL 36849-5624

Re: Support letter for Transform™ WG Section 18 on sorghum

Dear Dr. Flanders,

Per your request, this letter is to confirm that Dow AgroSciences supports the pursuit of a Section 18 emergency exemption for Transform WG to control sugarcane aphid in sorghum in the state of Alabama. Transform WG has provided excellent efficacy against sugarcane aphid in previous use under Section 18 exemptions, with no negative impacts on non-target insects. It represents a new class of chemistry with a novel mode of action, and controls pests resistant to other classes of chemistry.

If you have questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Thomas".

Jamey Thomas, Ph.D.  
US Regulatory Manager  
Dow AgroSciences

cc: Tami Jones-Jefferson, DAS

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